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Attorneys for Plaintiff

KATHLEEN A. COYNE

**JOHN J. SANSONE, County Counsel**

**County of San Diego**

**WILLIAM H. SONGER, Senior Deputy (SBN 153733)**

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San Diego, California 92101-2469

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

KATHLEEN A. COYNE,

Plaintiff,

v.

COUNTY OF SAN DIEGO, a public entity,

COUNTY OF SAN DIEGO,

DEPARTMENT OF THE PUBLIC

DEFENDER, a public agency; and DOES 1-

25, inclusive,

Defendants.

CASE NO. 08 cv00639 JLS (LSP)

PROPOSED DISCOVERY PLAN

[F.R.C.P. 26(F)]

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on Thursday, May 8, 2008, at the County Administration Building, 1600 Pacific Highway in San Diego, California, and was attended by:

Mark A. Bennett, The Law Office of Mark Alan Bennett, for Plaintiff KATHLEEN COYNE.

William Songer, Senior Deputy, The Office of County Counsel, for Defendant THE

1 COUNTY OF SAN DIEGO.

2 2. Pre-Discovery Disclosures. The parties intend to engage in the initial disclosures  
3 pursuant to Fed. R. Civ. P. 26(a)(1) one week after the Plaintiff responds to Defendants initial  
4 discovery requests, or no later than June 16, 2008

5 3. Discovery Plan. The parties jointly propose to the court the following discovery  
6 plan:

7 Discovery will be needed on the following subjects: the facts supporting Plaintiff's claims  
8 of retaliation and discrimination as alleged in her complaint filed February 29, 2008, the damages  
9 claimed by Plaintiff, and the defenses asserted by Defendant in its answer to the complaint filed  
10 on April

11 The parties estimate that discovery will be completed by December 30, 2008.

12 In addition to written discovery available under the FRCP, the parties currently estimate  
13 the following number of depositions, not including expert depositions: Five to six depositions by  
14 Plaintiff; one to two depositions by Defendant

15 Each deposition limited to a maximum of 7 hours unless extended by agreement of  
16 parties, or order of the Court.

17 Reports from retained experts under Rule 26(a)(2) will be exchanged September 30,  
18 2008, unless ordered otherwise by the Court

19 Reports from rebuttal experts pursuant Rule 26(a)(2)(C)(ii), will be exchanged on  
20 October 30, 2008, unless otherwise ordered by the Court.

21 Supplemental Disclosures under Rule 26(e) will be due on November 30, 2008.

22 4. Other Items.

23 All Pretrial Disclosures, and objections, shall be exchanged pursuant to Rule 26(a)(3)

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1 The case should be ready for trial by March 2, 2009, and at this time is expected to take  
2 approximately seven days..  
3

4 Respectfully submitted,

5 LAW OFFICE OF MARK ALAN BENNETT  
6

7  
8 Dated: May 22, 2008


By:

  
MARK A. BENNETT,  
Attorney for Plaintiff Kathleen A. Coyne

10  
11 JOHN J. SANSONE, County Counsel  
12

13  
14 Dated: May 22, 2008

By:

  
WILLIAM H. SONGER, Senior Deputy  
Attorneys for Defendant County of San  
Diego

**LAW OFFICE OF MARK ALAN BENNETT**  
**MARK A. BENNETT (SBN: 175974)**

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Attorneys for Plaintiff  
 KATHLEEN A. COYNE

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA

KATHLEEN A. COYNE,	)	CASE NO. 08 cv00639 JLS (LSP)
	)	
Plaintiff,	)	
	)	DECLARATION OF SERVICE BY
v.	)	ELECTRONIC MAIL
	)	
COUNTY OF SAN DIEGO, a public entity,	)	Person Served:
COUNTY OF SAN DIEGO,	)	William H. Songer, Esq.
DEPARTMENT OF THE PUBLIC	)	
DEFENDER, a public agency; and DOES 1-	)	Date Served:
25, inclusive,	)	May 22, 2008
	)	
Defendants.	)	
	)	
	)	

I, the undersigned, declare under penalty of perjury that I am over the age of eighteen years and not a party to this action. My business address is 1111 Sixth Avenue, Suite 404, San Diego, California 92101. On May 22, 2008 I served the following documents:

**PROPOSED DISCOVERY PLAN [F.R.C.P. 26(F)]**

by following the procedures for electronic filing with this Court thereby causing electronic service on the parties listed below:

**William H. Songer**  
**COUNTY OF SAN DIEGO,**  
**OFFICE OF COUNTY COUNSEL**  
 1600 Pacific Highway, Room 355  
 San Diego, CA 92101-2469  
 619-531-4749 Telephone  
 619-531-6005 Facsimile  
william.songer@sdcounty.ca.gov Email

**Attorneys for Defendants**  
**County of San Diego and**  
**County of San Diego,**  
**Department of the Public**  
**Defender**

1 I declare that I am employed in the office of a member of the bar of this court at whose  
2 direction the service was made.

3 Executed on May 22, 2008 at San Diego, California

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6 Attorney for Plaintiff Kathleen A. Coyne  
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